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April 26, 2023

## **VIA ECF**

Honorable Jennifer H. Rearden United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007 SO ORDERED.

Jennifer H. Rearden, U.S.D.J.

07 Date: April 27, 2023

Re: Cortes et al. v. Corned Beef Express, LLC et al

Docket No.: 20-cv-03546-MKV

Your Honor:

Our office represents Plaintiffs in the above-referenced action. On April 14, 2023, the Court ordered Plaintiffs to renew their default motion, if they wish, by May 1, 2023. Plaintiffs are currently in the process of requesting certificates of default based upon their renewed service of the Complaint on certain Defendants (Docket No. 57). Plaintiffs also anticipate needing to revise their default motion to reflect the updated service. As such, Plaintiffs respectfully request a three-week extension of the deadline to renew their default motion. The new deadline would be May 17, 2023. This is the first request of its kind.

Thank you for your attention

Respectfully submitted,

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DATE FILED: 4/27/2023

/s/ Jesse Barton, Esq.
Jesse Barton, Esq.